

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**RIGHT OF WAY MAINTENANCE  
EQUIPMENT COMPANY,**

**Debtor.**

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§

**Case No. 09-35037**

**Chapter 11**

**THE SHACKELFORD LAW FIRM'S AND PATRICIA A. SHACKELFORD'S  
NOTICE OF OPPOSITION TO DEBTOR RIGHT OF WAY MAINTENANCE  
EQUIPMENT COMPANY'S EXPEDITED MOTION FOR USE OF  
CASH COLLATERAL**

TO THE HONORABLE JUDGE OF SAID COURT:

The Shackelford Law Firm and Patricia A. Shackelford (collectively, "Shackelford") hereby file this Notice of Opposition to Debtor Right of Way Maintenance Equipment Company's ("Rowmec") Expedited Motion for Use of Cash Collateral (Dkt. #20), as follows:

Shackelford hereby joins, adopts and incorporates by reference as if fully set forth below the entirety of the Notice of Opposition of Bandas Law Firm, P.C., Christopher A. Bandas, Jeffery D. Meyer, and Moulton & Meyer, L.L.P.

On August 5, 2009, Rowmec filed an adversary proceeding against Shackelford.<sup>1</sup> Shackelford has not yet appeared in that lawsuit. Shackelford hereby notifies the Court, and counsel for all parties, that she opposes Rowmec's expedited motion for use of cash collateral and will submit a response to that motion in accordance with the Local Rules for the United States Bankruptcy Court for the Southern District of Texas, Houston Division. Further,

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<sup>1</sup> *Right of Way Maintenance Equipment Company v. Cambridge Management Group, LLC, et. al*, Adversary No. 09-03303; in the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

Shackelford will submit briefing to the Court regarding jurisdictional matters that preclude the Court from acting on Rowmec's request. Shackelford will show that the funds at issue are the subject of litigation that was commenced before Rowmec's bankruptcy petition and are being held pursuant to an order from the Court that has dominant jurisdiction. Further, Shackelford intends to file a motion to lift the automatic stay in order to continue litigation commenced before Rowmec's bankruptcy proceeding.

Respectfully submitted,

**CRUSE, SCOTT, HENDERSON & ALLEN, L.L.P.**

By: /s/ Lauren Held Harris

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PATRICIA A. SHACKELFORD**

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**CERTIFICATE OF SERVICE**

I hereby certify that on Friday, August 28, 2009 a true and correct copy of the foregoing instrument was forwarded to all counsel of record via CM/ECF pursuant to FED. R. CIV. P. 5 and FED. R. BANKR. P. 7005.

/s/ Lauren Held Harris

Lauren Held Harris